

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

DOCKET NO. 1:15-cr-10256-RGS-8

ANA GARCIA

ASSENTED TO MOTION TO AMEND RELEASE CONDITIONS

NOW COMES the accused, Ana Garcia, by and through counsel, Paul J. Garrity, and hereby moves this Court to amend her release conditions to permit her to travel to New Hampshire on July 22, 2016 and to return to the District of Massachusetts on July 24, 2016.

In support of this Motion the accused states as follows:

1. The accused's release conditions on the above captioned matter require that she not leave the District of Massachusetts.
2. The accused wishes to travel to Campton, NH to celebrate her birthday. If authorized, the accused would be traveling to New Hampshire on July 22, 2016 and returning to Massachusetts on July 24, 2016. The accused would be staying at Armsby Circle 7, Campton, NH if allowed to travel outside of Massachusetts.
3. The Government does not object to this motion.
4. The accused's pre-trial services officer, Jessica Turkington, does not object to this motion.

WHEREFORE, the accused respectfully requests that this Court grant her motion and amend her release condition to allow her to travel to Campton, NH from July 22, 2016 to July 24, 2016.

Respectfully submitted,

Ana Garcia,
By her Attorney,

DATE: February 9, 2016

/s/ Paul J. Garrity
Paul J. Garrity
Bar #905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, hereby certify that on this 19th day of July, 2016 a copy of the within motion was e-filed for all parties involved.

/s/ Paul J. Garrity